EPSTEIN BECKER & GREEN, P.C.
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Regeneron Pharmaceuticals, Inc.

IN THE UNITED STATE DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARGARET OROSZ 333 Mamaroneck Avenue White Plains, NY 10602, Plaintiff, vs. REGENERON PHARMACEUTICALS, INC. 777 Old Saw Mill River Road Tarrytown, NY 10591, Defendant.	Civil Action No.: 7:15-cv-08504(NSR) **DECLARATION OF CHRISTOPHER M. FARELLA**

I, Christopher M. Farella, being over 18 years old, hereby declare as follows:

1. I am Counsel with the law firm of Epstein, Becker & Green, P.C., attorneys for Defendant, Regeneron Pharmaceuticals, Inc. ("Regeneron"), in the above captioned matter.

2. I make this declaration based upon my own personal knowledge, and I submit it in support of Regeneron's motion to dismiss Count IV of Plaintiff's Second Amended Complaint.

3. On May 17, 2016, the parties appeared before Hon. Lisa Margaret Smith for a status conference. At that time, the parties conferred with the Court regarding the potential filing of a Second Amended Complaint alleging a failure to hire claim, and Defendant's intention to file a motion to dismiss same should it be filed. At that time, the parties discussed their relative positions regarding same.

4. On May 20, 2016, Plaintiff filed the within Second Amended Complaint [D.E. 18] and this motion follows.

5. A True and accurate copy of Plaintiff's Second Amended Complaint is attached as Exhibit A.

6. A True and accurate copy of the job description for Facilities Architect, Space Planning is attached as Exhibit B.

7. A True and accurate copy of an e-mail string between Patricia Hamilton and Plaintiff, dated June 6, 2014 and July 9, 2014, is attached as Exhibit C.

8. A True and accurate copy of an e-mail string between Plaintiff and Patricia Hamilton, dated July 24, 2014, is attached as Exhibit D.

9. A True and accurate copy of an e-mail from Plaintiff to Daria Palestina, dated July 28, 2014, is attached as Exhibit E.

I declare under penalty of perjury that the foregoing is true and correct.

CHRISTOPHER M. FARELLA

DATED: June 9, 2016